

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

THE ESTATE OF YARON UNGAR, et al.

v.

No. 00 - 105L-DLM

THE PALESTINIAN AUTHORITY, et al.

PLAINTIFFS' MOTION TO ENLARGE

Plaintiffs hereby move the Court to enlarge the period of time in which to file their response to defendants' Motion for Relief from Default Judgment, docket #408. Plaintiffs request an enlargement until February 1, 2008.

Plaintiffs' motion is supported by the attached memorandum. A proposed order is also attached.

Plaintiffs, by their Attorney,

/S/ David J. Strachman
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CERTIFICATION

I hereby certify that on January 16, 2008 I served this motion along with the attached memorandum and proposed order via ECF to the following counsel of record:

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/S/ David J. Strachman

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MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION TO ENLARGE

Plaintiffs respectfully request that the Court enlarge until February 1, 2008 the period in which to respond to Defendants' Motion for Relief from Default Judgment, docket # 408.

On December 28, 2007, Defendants filed a motion for relief from the final judgment entered in this matter on July 13, 2004.

According to Plaintiffs' calculation, their response to the motion is due on January 17, 2008.

Defendants' filing is more than 50 pages in length, references more than two dozen exhibits, and makes numerous legal, factual and political arguments in support of the relief requested. Naturally, Plaintiffs desire to thoroughly respond to these arguments and intend to do so.

However, Plaintiffs are in need of additional time to file their response to Defendants' motion for several reasons, including but not limited to counsel's trial and court schedule and out of state travel.

Additionally, Plaintiffs intend to include with their response memorandum several foreign language documents that require translation. The translator has indicated that additional time is needed to complete the translations.

Certainly, an additional two week enlargement could not prejudice the Defendants as final judgment entered almost three and a half years ago and since Defendants, by their own admission, have deliberately and strategically delayed and timed the filing of their present motion to gain a perceived advantage.

In light of the Defendants' calculated filing and the history of this case, a two week enlargement is not unreasonable

Plaintiffs have not previously requested an enlargement with respect to Defendants' pending motion.

Wherefore, Plaintiffs respectfully request that the Court grant their request for enlargement until February 1, 2008.

Plaintiffs, by their Attorney,

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